

p. 1817 / ~~Feb 2 draft~~ / comments / response / ch 1 - resp. used  
 Agn 2 draft

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
13	10	1?		Lehman, DWR	A guide to the EIR/EIS is good, but the current one is not clear or directed and filled with unnecessary information. First give the goal of the program (this is not to select alternatives - see 1-3 para 1), then list the major topics such as executive summary, EIR. Follow with a brief summary of what is in each section. A brief discussion of the alternatives should go with the EIR/EIS description. Leave the appendices to a single, much reduced, table; the current flow chart and table are too much detail. I would leave the flow chart out unless more information is included in the text to support it.	P	
2	11	1?		EPA	add reference to common programs and articulate program. More clearly discuss what this document is intended to do and qualifiers with respect to the status of data and ongoing development.		
3	12	1?		CDFA	identify areas of conflict/controversy in main document (CEQA sect. 15123 (b)(2))		
14	13	1?			include discussion of how this document will be used (intended uses of document)		
772	26	1- ch 1	Introduction	Holt, USBOR	The citing of the Delta as the source of the water may be misconstrued with the source areas in the Northern and Central California mountains, where measures to increase useable supplies and storage of most "new" water should be considered.  Referring to the Delta as if it were the original source of water rather than simply the diversion point, will cause a heightened concerns that may impede progress in the long run.		
16	29	1-	Chapters 1, 2	Finrock, DWR	Chapter 1 is more background leading up to the CALFED Phase II Alternative Development Process, than it is Introduction. Chapter 1 and Section 2.1 could be combined and streamlined. So much of these first pages are too wordy, there is a lot of repetition, and too much non-essential information is given.	P	

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24	30	1 -	Chapters 1, 2	Finrock, DWR	There are 4 subjects addressed over and over again: ecosystem health, water supply reliability, water quality, and levee system stability. <b>The importance of these subjects can be presented without so much repetition.</b> In the text they are referred to as: "primary objectives" (pp 1-1, 1-7), "overall objectives" (1-7), "key program areas" (1-7), "critical resource categories" (1-3), "components", "four components" (2-1, 2-4), "CALFED components" (2-1), "4 main categories of problems" (2-1), "needs" (1-5), and "goals" (1-4). They should be given a name, say "4 CALFED components", and then always referred to as such.	P	
1009	31	1	•2nd	BK, EPA	Consider adding steps and questions to guide the general public reader in their review of the EIS/EIR (see comments below)		
1011	32	1	•3rd	BK, EPA	<p><u>Pace of introduction of content:</u> Consider a Guide sub-section describing for the reader the pathway they will be lead through from general information to full details. Consider using a series of diagrams linked to the text. Sequence introduction of material, starting with most general depiction (e.g., 5-6 boxes), link one box in first diagram to a second diagram showing more details of that 1st box (5-10 more detailed boxes), which could in turn reference the tables and figures in the EIS/EIR (e.g., such as those noted in Section 2, comment #4).</p> <p><u>Decision Criteria:</u> Consider an explanation of how the following concepts were used in evaluating the alternatives (this could be part of the methodology discussion see Section 2, comment # 15): mission statement, primary objectives, solution principles, significance criteria. <i>Possibly Phase II document?</i></p> <p><u>Big Picture:</u> Consider a poster (in a pocket) that shows all of the details, and how they fit together on one map, one table, one figure, and how they support the Preferred Program ( the participants and processes could be on one side of the poster, the map and figures/tables on the other side of the poster)</p> <p><u>Index:</u> Consider including an index</p> <p><u>Electronic Version:</u> Consider an electronic format (disk, CD) that would allow the reader to follow a line of assessment for a resource, alternative, or area by using a "go to" or "find" key on their PC - this would require the rigorous use of key terms in text and tables/figures enable the links.</p>		

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1010	33	1	•3rd	BK, EPA	<u>Content organization</u> : Consider a Guide sub-section that shows the reader how the following groups of information generally relate: who (CALFED), why (Problem, Mission), where (maps), how (processes - public participation, assessment, decision making, implementation), when (history, EIS/EIR completion, adaptive management time frames), what (resource descriptions), how well/how much (assessments - resource-specific and cumulative); cross-referenced to where the material is in the documents.		4
51	34	1-4	Ecosystem Quality	George Barnes, DWR	Implementing all 5 of these actions may not improve aquatic habitat or ecological functions unless this program addresses the effects of introduced species and the effects of toxics and pollution.	C	6
52	35	1-5	Ecosystem Quality	George Barnes, DWR	No mention of introduced species and their effects. Introduced species may limit the effectiveness of various actions now being considered.	C	5
1	36	1-		K. Kelly, DWR	Right at the beginning of the document the overall vision needs to be presented that illustrates how storage, conveyance, the ERP, water quality, water use efficiency, levee stability, and all the other components are to fit into the solution. It would be inspiring, not gushy, primarily because of the scope and sincerity of the undertaking. This discussion would be followed by a simple statement of the purpose of the Programmatic EIR/S and recommend the reader skip to the Phase II chapter and mention other documents that may be of more interest to them. This text would be addressed to the general public.	P	4

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2	37	1-		K. Kelly, DWR	<p>Adaptive management is an important concept to the Program and mechanism for implementing the components of the Program. The concept can easily be degraded to an excuse for misguided efforts so careful consideration needs to be given of how adaptive management is presented in the admin draft. The discussion on page 1-3 isn't clear. The discussion in section 1.5.4 is pretty good but it doesn't address the issue of what entity (is) are in charge. The text should address this issue directly, not presenting an answer but capturing the issue correctly. Examples of how adaptive management would work and at what level it could be done in the CALFED long-term solution structure would be helpful.</p> <p>Other comments on adaptive management: The framework can be developed as Phase III proceeds not necessarily during the transition between Phases II and III. (see page 1-3)</p> <p>Any reference to adaptive management needs to be very consistent with the description as presented in Chpt. 1. On page 2-10, Levee program, adaptive management is referred to in the development of best management practices. Some of the levee program appears to be research efforts (it better be research, otherwise CALFED is proposing extensive land use changes in the Delta). The discussion on page 2-10 should emphasize the nature of the efforts and how they will be incorporated into an adaptive management process.</p>	P	4
7	41	1-		K. Kelly, DWR	Throughout Chapt 1: The goals, needs, objectives are so similar that I wondered why I needed to read so much text. Try to condense the text by linking the discussions more closely.	P	2
7	46	1-1		USFWS	'regulatory gridlock' types of wording gives wrong impression that CALFED is trying to solve regulatory issues rather than resource issues (see comment 8 from DFG). Check tone - some fish populations		1
8	47	1-1		BOR	Bay Delta facts - box add drinking water info		1
1143	48	1-1	bottom of first column	FWS	Again, don't focus on "regulations" and their effects; instead, this should say something like "project reoperations to provide minimal protection to these species and other fish and wildlife reduced the amount of water available . . ."		1
1019	49	1-1	box	BK, EPA	• 1,200 species ...		1

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501	50	1-1 <div>wrong page ref.</div>	Last Sentence	DFG	Modify last sentence to read: "Separate appendices for air quality, noise, public health and environmental hazards, transportation, and visual resources were not needed."  Add sentence: "The information provided for the affected environment describes the environmental baseline or existing condition with which the No-Project and Program alternatives will be compared."		
504	51	1-1	Left Column, Paragraph 3, Line 6; and Right Column, Paragraph 1, Line 1	DFG	Modify to read: "Water management changes implemented to protect these listed species reduced...."		1
1144	52	1-1	middle of 2nd column	FWS	The discussion of "any alternative emerging" and the 4 primary objectives seems out of place in this section on the "origins of CALFED". Isn't there a "purpose" section these would better fit in?		1
776	53	1-1	Section 1	Choward, USBOR	There appears to be a lot of repetition in various sections.		4
32	54	1-1	Section 1.1.2	Finrock, DWR	A short description of causes of "regulatory gridlock" would be good.	C	1
502	55	1-1	Paragraph 3; left column; line 2	DFG	Insert the word "some" before "fish".		1
503	56	1-1	Paragraph 3; left column; line 6	DFG	Modify line to read: "...Species Act (federal ESA) and State Endangered Species Act (CESA)." These acronyms should be used consistently throughout the report.		1
683	57	1-1	Sect. 1.1.1, first sentence	WAPA	California's two largest rivers are fed by runoff from the Cascade and Coastal ranges as well as the Sierra Nevada. Suggest substituting "mountains and foothills surrounding California's Central Valley, the state's two largest rivers,..." in place of "Sierra Nevada, California's two largest rivers,...".		1

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1141	58	1-1	1st column, 3rd paragraph	FWS	"... these factors and a 7-year drought combined ...": this should be worded carefully. We shouldn't pin blame on the drought; functioning ecosystems can respond and adapt to natural perturbations in environmental conditions. Change to something like: "... these factors reduced the ability of the Bay-Delta ecosystem to respond appropriately to the 7-year drought; this, combined with the ongoing effects, pushed several fish populations . . . ."		1
1140	59	1-1	1st column, 2nd paragraph	FWS	"... dependent on water imported from the Bay-Delta watershed": the problem, and the dependency, is not entirely "exports". Westlands, for example, is within "the Bay-Delta watershed", as well as the bay area cities, and the entire Sacramento Valley and Delta. It's the diversion of water from the rivers that's the basic problem, not the "export of water from the watershed".		1
1139	60	1-1	1st column, 1st paragraph	FWS	The 1200 species of fish and wildlife use the delta as more than a "nursery ground and migration corridor"; some species are actually resident in the delta throughout their life cycle. The (relatively few) species of anadromous fish, of course, use the delta as a nursery or migrate through it; the 1190 or so other species (as well as a few of the anadromous fish) use it for other purposes: many (resident fish, small mammals, amphibians, a few birds, all plants) spend their whole lives there; some breed there (some fish, some birds); some even spend the winter there (some shorebirds). "Restoring the delta" for these species means a lot more than reestablishing migratory corridors or nursery areas. Recommend changing the sentence to say "... the largest wetland habitat in the western United States and supporting more than 1200 species ...", or something like that. (How do plants figure into this count?)		1
1142	61	1-1	1st column, 3rd paragraph	FWS	Aren't both winter-run and delta smelt listed by the State as well?		1
1138	62	1-1	1st column, 1st paragraph	FWS	Why focus on "fruits and vegetables"? Suggesting that water from the delta is used on these crops exclusively (as opposed to rice, irrigated pasture, alfalfa, grains, sugar beets, cotton, etc.) contributes to the feeling that CALFED is stacking the deck against various water use and demand management measures. If we're going to describe how water from the delta is used, we should be more comprehensive.		1
1137	63	1-1	1st column, 1st paragraph	FWS	Why identify the dollar value of "California's ag industry"? Is there universal agreement on this dollar value? How does it compare to the dollar value of other industries that rely on water--including drinking water--from the Delta? I'd probably delete this.		1

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1508	64	1-1	1 <sup>st</sup> para	SWRCB	The statement that 45 percent of the nation's fruit and vegetables are irrigated with water from the Delta may be inaccurate and should be checked.		
1017	65	1-1	1.1	BK, EPA	consider inserting box with Mission Statement, e.g., p 1-7		2
28	66	1-1	1.1.1 last line	K. Nelson, DWR	Listings did more than amount of water available for export: limits other typical activities in the Delta including dredging, levee maintenance, marina maintenance, etc.	T	1
33	67	1-1	1.1.1, second para	Finrock, DWR	Add "loss of habitats to agricultural, urban, and industrial development" to the 2nd sentence.	T	1
34	68	1-1	1.1.1 last line	K. Nelson, DWR	Listings did more than amount of water available for export: limits other typical activities in the Delta including dredging, levee maintenance, marina maintenance, etc.	T	1
596	69	1-1	1.1.1	Rick B., CALFED	new section in attached disc starts of this chapter moving Background down. text box at bottom of page text remains same except, 1,200 species should be 120 species; 12,000 species should be 120		1 3?
1018	70	1-1	1.1.1	BK, EPA	consider alt: Runoff from the Sierra Nevada Mountains feeds California's two largest rivers, ... which meet ... consider x-ref to map Fig 2.3.2-1 and §2.3.1 (description of Problem and Solution Areas)		2
38	71	1-1 1-7; 2-4	1.1.2 1.3.1 2.1.1.6	K. Nelson, DWR	The four components of the common program are referred to in several different ways in orders. It would help the consistency of the document to choose standard terminology and a common order for the components: Water Quality, Ecosystem Quality, Water Supply, Vulnerability of Delta Functions. Or explain significance of different terminology.	C	1
597	72	1-1	1.1.2	Rick B., CALFED	remains as written		1
986	73	1-1	1.1.2, second paragraph	TH, EPA	Corrections needed to sentence: Any alternative emerging from the <u>CALFED</u> planning process... (i.e., not part of the Accord). In <u>December</u> 1997 the <u>state and federal</u> signatories...		1
5	74	1-1	1.1.2	EPA	Date change from Sept to Dec, signatories are state and federal		1
4	75	1-1	1.1.2	BOR	Framework agreement needs discussion included to describe		1

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598	76	1-1 and 1-2	1.1.3	Rick B., CALFED	Section now begins with paragraph on page 1-2 beginning "CALFED is made up of ....". Current first paragraph on page 1-1 is moved to the end just before 1.1.4. and modified as follows: in first sentence delete "with management... in the Bay-Delta"; make a text box for the last sentence about BDAC; and replace "includes representatives... groups" with "is comprised of 34 water leaders from throughout California" in that sentence. Also, add the following sentences to the text box as well "The BDAC meets regularly with CALFED agencies and staff to review the status of work on developing the recommended program. Additionally, BDAC has formed several subcommittees, called workgroups, on various issues to provide more focussed attention on particularly complex issues. This group of public-advisors helps define problems in the Bay-Delta system, helps to assure broad public participation, comments on environmental reports, and offers advice on proposed solutions." Delete last paragraph in left column on page 1-2 which continues in right column, it begins "Under both the National ...". 2nd full paragraph right column page 1-2 begins "The third element..." Modify third sentence of this paragraph by replacing "will be" with "is being" and insert "by the CALFED Bay-Delta Program" between "carried out" and "under the".		1
30	77	1-1	2	Lehman, DWR	I would not say development activities have lead to degradation of the Bay-Delta - this is not a fact, but an assumption. Things such as river flows in the summer produced by reservoir management, may have been good for some fishery resources. You can say these activities may have caused changes in the Delta that contributed to a loss of fishery resources. Or you can say we are concerned that these factors in combination with natural processes may have produced the loss of fishery resources - this seems better.	T	1
37	78	1-1	2	Lehman, DWR	I would not say development activities have lead to degradation of the Bay-Delta - this is not a fact, but an assumption. Things such as river flows in the summer produced by reservoir management, may have been good for some fishery resources. You can say these activities may have caused changes in the Delta that contributed to a loss of fishery resources. Or you can say we are concerned that these factors in combination with natural processes may have produced the loss of fishery resources - this seems better.	C	1
6	79	1-1	2	CDFA	incorrect statement regarding dependance on importation of water		1



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31	80	1-1	3	Lehman, DWR	You are presenting a lot of assumptions as facts, just say : During the 1980s and early 1990s winter-run salmon and delta smelt were listed .... Take out "brink of extinction" - this is unnecessary hype. Also it sounds like everything is based on these two species. List other "problems" with ecosystem resources alluded to in the previous paragraph.	C	1
35	81	1-1	3	Lehman, DWR	Move "Regulations..." to a new paragraph and expand on why the fishery resources are of economic concern. What are these "economic disruptions". Include sport fishing as an economic impact.	C	1
36	82	1-1	6	Lehman, DWR	Instead of "comprehensive solution" say something like comprehensive management plan	C	1
29	83	1-1	6	Lehman, DWR	Instead of "comprehensive solution" say something like comprehensive management plan	T	1
595	84	1-1 to 1-15	chapter 1	Rick B., CALFED	<b>Overview</b> This chapter should be called Purpose and Need not Introduction. Section 1.1 will be called Programmatic Nature and Organization of the Programmatic EIS/EIR and not Introduction. Attached Disc has this section. Section 1.1.1 will follow this new section. Section 1.1.3 is revised. Section 1.1.4 is revised. Section 1.2 and 1.3 are moved. Parts of 1.5 are moved to chapters 2 and 4. . Since we are no longer doing an HCP, Section 1.6/7 goes to Chapter 11.		1
508	85	1-10	Right Column, Bullet 5	DFG	Add after word "environment" the following phrase: "also referred to as the environmental baseline or existing condition".		
1154	86	1-10	Section 1.4.2	FWS	The first sentence of the last paragraph of this section should be changed as follows: "The program document supports the consultation and coordination process for the Habitat Conservation Plan (HCP) State and Federal Endangered Species Act compliance process, the process followed for compliance with Section 404(b)(1) of the Clean Water Act, and the Fish and Wildlife Coordination Act.		
1119	87	1-10	1st partial paragraph	GL, EPA	The concept of an issue or topic that will be addressed through a "second-tier document" should be highlighted by providing an example of a specific issue that could be addressed in this manner.		2

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65	88	1-10	2nd Column, 2nd full paragraph	Sandino, DWR	Statement that program document supports HCP process may not be quite right. I thought the need for an HCP is still undecided. Perhaps Section 7 may be more appropriate or maybe additional ESA compliance will not be needed for a particular Calfed component because of no impact or avoidance measures. I would simply mention that the document will be used to support ESA compliance as appropriate. I would also make the same general statement about CESA.	P	
12	89	1-10;1-11;1-14;1-15			Review ESA and CESA discussions for consistency (cross check with chapters 10 and 11		
67	90	1-11		K. Kelly, DWR	Is it still the case that the programmatic eis/r will be used to satisfy NEPA requirements in the approval process for the HCP/NCCP given that we have decided to do a conservation strategy?	C	
509	91	1-11	Right Column; Paragraph 2; Lines 4, 6, 7 and 8	DFG	Modify as follows, " ..under federal ESA Section 10 and CESA sections 2081 and 2090. Thus the Programmatic EIS/EIR will incorporate ESA issues." Delete the remainder to the sentence.		
1155	92	1-11	Section 1.4.3	FWS	The fifth bullet should be changed as follows: "Coordination and Compliance Reports: Coordination and compliance of various program elements with applicable regulations or public involvement processes. Included in the consultation and coordination process are information on the Endangered Species Act compliance, including development of an HCP and Section 7 processes, the process followed for compliance with Section 404(b)(1) of the Clean Water Act, and the process followed for the Fish and Wildlife Coordination Act."		
688	93	1-11	Section 1.5	WAPA	Explain phases I and II before jumping into phase III		1?
1156	94	1-11	Section 1.5.1	FWS	This section seems to say something like, "at the end of Phase II, about the only thing that will be done is the permitting of certain actions--even though those actions being permitted won't be specifically identified in Phase II", which seems designed to make some readers nervous. Recommend deleting the entire section 1.5.1.		

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1157	95	1-11	Section 1.5.1	FWS	In any case, omit the entire last paragraph in this section; Section 10 permits will require "second tier" documents. "This Programmatic EIS/EIR will be used to satisfy NEPA requirements in the approval process for the HCP/Natural Community Conservation Plan under ESA Section 10. Thus, the Programmatic EIS/EIR will incorporate ESA issues in order to avoid additional listing of species, address the need for incidental take permits, or other ESA problems in the future."		
605	96	1-11	1.5	Rick B., CALFED	replace 1.5.1 with paragraphs 1 and 3 of the Programmatic Nature description on the disc absent the first two sentences of the first paragraph.		
787	97	1-11	1.5.1, last paragraph, last sentence	Lee, USBOR	Suggest including some discussion of Section 7 ESA issues.		
989	98	1-11	1.5.1	TH, EPA	Edit: "This Programmatic EIS/EIR <u>may</u> be used.... Thus, the PEIS will <u>evaluate</u> ESA issues...." (Cannot at this time presume that the HCP/NCCP process has been worked out.)		
71	99	1-11	1.5.2	K. Nelson, DWR	The reader could use a "heads up" here regarding the necessary integration of implementation of CALFED, CVPIA, SWRCB and other large, ongoing programs within the same geographic region as CALFED.	C	
66	100	1-11	2nd Column, 1st full paragraph	Sandino, DWR	Statement that program document supports HCP process may not be quite right. I thought the need for an HCP is still undecided. Perhaps Section 7 may be more appropriate or maybe additional ESA compliance will not be needed for a particular Calfed component because of no impact or avoidance measures. I would simply mention that the document will be used to support ESA compliance as appropriate. I would also make the same general statement about CESA.	P	
606	101	1-11-12	1.5.2	Rick B., CALFED	delete the first paragraph; insert "program" between "preferred alternative" on fourth line of 2nd paragraph. similarly, insert "program" between "preferred alt" in the 3rd paragraph. move to chapter 2 just after 1.5.4		
68	102	1-12		K. Kelly, DWR	The CMARP discussion is unclear. The management structure will assign responsibility and accountability to whom for what and assure the continuity of elements and objectives of which plan?	C	

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788	103	1-12	First full sentence	Gore, USBOR	Phased implementation is discussed here only in terms of different time scales required for implementation of different components. A discussion of the adaptive management process/philosophy as related to phased implementation should also be discussed.		
789	104	1-12	1.5.2, last paragraph, last bullet	Lee, USBOR	Programmatic permitting can address some assurance needs and stakeholders' concerns in a general permit. However, potential modifications for each specific project in the program should be recognized.		
72	105	1-12	1.5.3	K. Nelson, DWR	Again, mention the need for integrating monitoring requirements for the other large programs. Perhaps even standardizing monitoring methodologies across programs.	C	
607	106	1-12	1.5.3 and 1.5.4	Rick B., CALFED	move 1.5.3 to chapter 2 just before 2.4. move 1.5.4 to chapter 2 after 1.5.3		1
13	107	1-12;1-13			consider expanding discussion of when and how mitigation monitoring plan will be developed		
74	108	1-13		Lehman, DWR	Remove adaptive management section - not needed here; also summarize phase III more. The introduction is already too long. I think this section could be reduced and still provide the needed information. Leave the details to specific sections - for example don't list the appendices.	C	
17	109	1-13		DFG	discussion on adaptive management, include text on linkages between species (ERP) see comments for text		
510	110	1-13	Right Column, Paragraph 1, Line 3	DFG	Add the following at the end of the second full sentence: "There is a linkage between the targets for tidal emergent wetland, tidal perennial wetland, seasonal wetland, and wildlife friendly agriculture, for State listed species such as Swainson's hawk and greater sandhill crane and wintering wildlife. Therefore, targets will not be changed in a manner that would result in adverse impacts to those wildlife species from the development of aquatic habitats."		
689	111	1-13	Section 1.5.4, first paragraph, line 6	WAPA	Awkward phrasing. Replace "inject" with "allow adjustments in response to".		
69	112	1-13	section 1.5.4	K. Kelly, DWR	adaptive management. second paragraph. Objectives aren't implemented. Actions to reach objectives are implemented. top of second column. The first full sentence doesn't make sense.	C	

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790	113	1-13	Section 1.5.4	Choward, USBOR	Section on Adaptive Management is unclear, general and redundant.		
73	114	1-13	Adapt. Mgt	Finrock, DWR	This section is not understandable. Too many euphemisms and buzzwords. 1st paragraph: The first sentence is good. The rest is not clear, and could be eliminated. The sentence, "Experimental management is included where improved knowledge is essential", is especially bad. 2nd paragraph: The second sentence is unclear: what is a "decision support system", and how would adaptive management provide it? 3rd paragraph: What are "target implementation levels", and how are they different from objectives or goals? What is a "treatment program"?	C	
1021	115	1-13	1.5.4	BK, EPA	Q: re: feedback loops - where will conditions that trigger feedback loops be described?		
1120	116	1-13	2nd column, 1st full sentence	GL, EPA	The reference to "treatment program" is unclear.		
70	117	1-14 to 1-15	Section 1.7	Sandino, DWR	I would tone down ESA compliance section a bit. "CalFed will comply with the Federal ESA of 1973 <i>as required</i> . . . ." Again, I think that there maybe components that already have ESA compliance or that may not need ESA or CESA take authorization.	P	
1158	118	1-14 to 1-15	Section 1.7	FWS	Omit all of the text in this section: "Federal and State ESA Compliance." The ESA Compliance Team will provide an overview of the compliance strategy to replace the current text in this section. The overview will be submitted under separate cover.		
608	119	1-14	1.6 and 1.7	Rick B., CALFED	delete 1.6. change 1.7 to 1.6		
990	120	1-14	1.7	TH, EPA	Statement regarding compliance with ESA should reference discussion p. 11-2.		
511	121	1-15	Left Column, Paragraph 2, Line 6	DFG	After the words "section 7 process", add in parentheses "or 2081 and 2090 processes".		
1022	122	1-15	1.7	BK, EPA	consider adding § (or x-refing 2.6 et seq.) for other Acts listed in 1.4.2, ¶4		
11	123	1-2		SWRQB	Make sure that CALFED's role in water quality standards is accurately stated (SWRQB)		?

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1145	124	1-2	column 2, 1st full paragraph and first bullet	FWS	"CALFED oversees the coordination and increased communication . . . water quality standard setting"? Is that really true? Or is this using "CALFED" loosely, rather than in reference to the "CALFED Bay-Delta Program"? I think this section should be moved back into the "origins of CALFED" section, right after the discussion of the Framework Agreement. It should say "The Framework Agreement provides for . . ."		?
987	125	1-2	1.1.3	TH, EPA	CALFED agencies include all of the agencies listed as co-leads and cooperators. Suggest providing a single, bullet list with parens identifying co-lead or cooperator. The COE and NRCS are not co-lead signatories.		2
773	126	1-2	1.1.3, last paragraph	Lee, USBOR	The Bay-Delta Accord did not "pave the way" for the CALFED Program. Suggest explaining the Framework Agreement in this paragraph.		1
599	127	1-2 and 1-3	1.1.4	Rick B., CALFED	change title to CALFED <u>Program</u> Phases I, II and III. On page 1-3. change textbox title to Key CALFED <u>Program</u> Milestones. 1st full paragraph, left column, 1st sentence begins "Phase I began..." replace "when scoping sessions" with "with a series of public workshops". 3rd sentence begins "This resulted..." replace "goals" with "objectives" and insert "(Section and then the # for the mission statement section)" at the end of the sentence. At end of second to last sentence which begins "This also resulted ..." add "(Section # for the description of Phase I alternatives)". 2nd full paragraph which begins "Phase II began..." Delete 3rd to next to last sentences they begin "The programmatic environmental ..." and end with "...select one preferred alternative". Insert in their place, "In addition to evaluating consequences of the various alternatives, the Program is trying to identify the preferred program alternative (Chapter 4)". 1st full paragraph, right column, 1st sentence, insert "program" between "preferred" and "alternative". Similarly, insert "program" between "preferred alternative" at end of 2nd full paragraph right column.		1
39	128	1-2	6	Lehman, DWR	Remove the words "to natural disasters" under levees and channels. Natural causes should be a factor in all of them.	T	
10	129	1-3		BOR	Phase III start date correct?		?
30	130	1-3		Steve Shaffer, CDFA	to move from phase II to Phase III, there needs to be an assurances package as well as an adaptive management framework		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
1147	131	1-3 and 1-7	Purpose and Need, lines 3-5, and Mission Statement	FWS	The PEIS should use more precise language to describe its purpose and objectives. For example, specific definitions need to be provided for terms such as "ecological health" and "beneficial uses". Please add a glossary to define terms such as these; this addition would make the document much more understandable. (Or, at a minimum for this draft, define these terms in the text.)		5
1146	132	1-3	sec 1.1.4 1st column, bottom paragraph	FWS	"Interrelated and cumulative" does not mean non-specific. That is, environmental review focused on broad policy and resource allocation decisions is not likely to have enough detailed information to provide decision-makers meaningful information about interrelated and cumulative effects. Delete everything in this sentence after "... resource allocation decisions".		
40	133	1-3	section 1.2	jw, DWR	It seems that a more logical order for this section would be to first discuss the need and then the goals for achieving the purpose for each of the resource categories.	P	
988	134	1-3	1.1.4	CY, EPA	Text refers to "prefeasibility studies and other decision documents." Currently there is no further mention of prefeasibility studies-- for example, in the Figure, page 5. There should be a complete list of the decision and technical support documents. More information needs to be provided about prefeasibility studies and, to the extent that decisions in Phase II depend on information developed from these studies, these documents should be part of the record.		
600	135	1-3	1.2	Rick B., CALFED	Will now follow the mission statement section (1.3).		1
41	136	1-3, 1-5	1.2 Purpose & Need, line 10	Steve Hayes, DWR	"System Integrity" (p.1.3) should conform with "Levee System Integrity" (p.1.5)	C	1
50	137	1-4		K. Kelly, DWR	The definition of the goal for water supply reliability doesn't seem right. Double check against what has been said about it in the past. There is no Mission Statement appendix	T	
1118	138	1-4		GL, EPA	Water Quality Discussion - reorder numbered objectives to move environmental uses from #5 to top (either #1 or 2). The ordering could be interpreted by the reader as a priority and environmental beneficial uses should be reflected as a high priority.		
44	139	1-4	Ecosystem Quality, #4.	Finrock, DWR	Why is waterfowl breeding habitat mentioned specifically? No other wildlife (except T&E species) are singled out.	T	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
1148	140	1-4	Ecosystem Quality, first paragraph	FWS	(1) line 11 of the paragraph: Plant species are neglected. Change to include improvement and increase of wildlife <i>and</i> plant species. (2) line 12: The term "population health" is vague and needs to be clarified. In fact, most of the last part of the sentence could probably be deleted. It could be changed to read "...support the sustainable production and survival of estuarine and anadromous fish, wildlife, and plant populations and species."		
1149	141	1-4	Ecosystem Quality, number 4	FWS	Reword to include plants (e.g. ...and associated riparian habitats for wildlife and plant species).		
601	142	1-4	text box	Rick B., CALFED	change "Mission StatementAppendix" to "Program, Goals and Objectives Appendix"		
43	143	1-4	"Water Quality"	Steve Hayes, DWR	Objectives should include "Improve the reliability and quality of water for agricultural needs."	T	
685	144	1-4 to 1-5, 1-7, and 2-3	Sections 1.2 and 1.3.2, Table 2.1.1-1	WAPA	Section 1.2 describes the goals of the four resources. The goals are summarized in the first point of " <i>Be Equitable</i> " in Section 1.3.2, and then are summarized again in Table 2.1.1-1. The confusion arises in that Section 1.2 identifies five objectives for each goal of the four resource areas. Are these 20 objectives in Section 1.2 the same as the 14 " <i>secondary objectives</i> " in Section 1.3.2 and the 14 " <i>subobjectives</i> " in Table 2.1.1-1? The PEIR/EIS should be consistent in terminology to avoid confusing the reader.		



A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
684	145	1-4	1.2.1	WAPA	<p>The "Purpose" of the proposed action is concisely stated in the opening line of the section. However, the goals and objectives are not measurable and therefore the timing of or effectiveness in attainment cannot be defined. The following are examples of how the objectives should read: "Increase the amount of shallow riverine habitat by 20% over the next 50 years."</p> <p><i>"Improve the movement of larval fish"</i>. Is this accomplished by channelization, increased instream flows, reduced flows, . . . ? The goal could be to provide the mechanism to improve, otherwise someone might infer a need to teach the juveniles a more efficient way to swim.</p> <p><i>"Reduce water quality degradation"</i>. Will there be cleanups, at what level, where are the sources, are there point source discharges, how many, what percentage can you fix, . . . ?</p> <p>There seems to be inconsistency in the objectives; e.g. reducing water quality degradation is under "Ecosystem quality" but not under "Water Quality"; reduce vulnerability is under "Water Supply Reliability" but not under "Levee System Integrity".</p>		
47	146	1-4	2	Lehman, DWR	Somewhere in here should be "desirable" fish etc.	T	
48	147	1-4	2 - 1	Lehman, DWR	Remove "entrapment/null zone" habitat - there is no entrapment zone upstream of Carquinez	T	
46	148	1-4	2-3	Lehman, DWR	Reduce water quality degradation "and enhance food quality and quantity at the base of the food web".	T	
49	149	1-4	4-4	Lehman, DWR	Awkward. "Improve or maintain the quality of raw water for recreational use; recreation includes the ability to safely consume fishery resources.	T	
45	150	1-4, 1-7	Goals, objectives	Finrock, DWR	SEE COMMENT 5. The goals and objectives look the same to me. Either combine them, offer a better explanation of the difference between them, or at least put the objectives in a section preceding the goals.	T	
42	151	1-4; 1-5; 1-6	All	K. Nelson, DWR	Group the "Purpose" statements with the appropriate "Needs" statements. I.e. group "Ecosystem Quality" text on page 1-4 with "Ecosystem Quality" text on page 1-5.	P	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
54	152	1-5		K. Kelly, DWR	Introduced species needs to be emphasized more, possibly the same level as entrainment. I have an article by Andy Cohen if you need it.	P	
9	153	1-5	bottom para left side	DFG	Why reference to downstream? Is it part of the problem or solution?		
57	154	1-5	Ecosystem Quality	Finrock, DWR	This is an incomplete outline of negative effects on the ecosystem. (1)Levees are only mentioned in conjunction with flooding associated with sedimentation due to hydraulic mining. Diking and reclamation of wetlands and their (2)subsequent subsidence should receive more emphasis. Also no mention of (3)losses of riparian forest and their importance for habitat and flood control, (4)channelization of rivers, or (5)introduction of invasive exotic species. (6)Dams have had a tremendous negative impact but are only mentioned in catch-all phrases such as "upstream water development".	T	
505	155	1-5	Left Column, Last Paragraph, Lines 6 and 7	DFG	Delete word downstream since it is not in the Problem area. Modify sentence to read: "...from activities within and upstream of the Bay-Delta system".		
59	156	1-5	"Ecosystem Quality"	Steve Hayes, DWR	Emphasize current impacts on the "health" of the Bay-Delta System such as the projected population growth within the drainage basins of the Sacramento and San Joaquin Rivers to the Delta. Growth impacts and other related management practices within the drainage basins now appear to pose more of a threat to the System than the past practices, no matter how precisely the past practices are documented	T	
775	157	1-5	Column 1	Choward, USBOR	Could items 2 and 3 be combined? Very similar		
686	158	1-5	Col.I, line 29	WAPA	"The Purpose Statement responds to the following needs:" There are NO needs discussed in the following sections. This entire section could be summarized in less than 12 sentences, e.g. "Ecosystem health has deteriorated since the 1800's and <u>needs</u> to be improved through habitat improvements, improving water quality, and instream flows" or whatever. . . "Future drinking water and irrigation water supplies <u>need</u> to be reliable".		
774	159	1-5	Para. 1 Sent. 2	Choward, USBOR	Sentence 2.."which collectively provide to management of the risk," needs some clarification.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
687	160	1-5	Col.2, par. 4, line 4	WAPA	The meaning of " <i>concentrations of substances</i> " is unclear and should be reworded. Does it refer to chemical composition? Dissolved solids? Undissolved solids such as silt? All of the above?		
53	161	1-5	2nd Column, 2nd full paragraph	Sandino, DWR	Statement that outflow has been "reduced" is not quite accurate. In some years, outflow has been increased for some times of the year. I would rewrite "reduced outflow <i>in some months . . .</i> "	T	
56	162	1-5	3	Lehman, DWR	Ecosystem health needs to be defined. Obvious omissions include water quality habitat factors - water temperature, dissolved oxygen problems in San Joaquin River, turbidity, homing water issues etc.	C	
58	163	1-5	3	Lehman, DWR	Consider mentioning bioaccumulation and acute versus chronic toxicity	T	
55	164	1-6		K. Kelly, DWR	"While some beneficial water uses depend on the Bay-Delta system for a portion of their water needs, others are highly or totally dependent on Bay-Delta water supplies." Way too generic. Include specific examples.	C	
15	165	1-6		DFG	discuss that levees are not getting higher relative to sea level		
506	166	1-6	Right Column; Paragraph 2; Lines 8, 9 and 10	DFG	Modify sentence to read: "...resulted in the need to continue to add more material to the levees increasing their height compared to the lands they protect. There is a growing concern that increasing levee heights relative to the land side, coupled with..."		
60	167	1-6	Water Quality, line 14	Finfrock, DWR	Change "forests" to "timber operations".	T	
1150	168	1-6	"Water Quality" section, line 7	FWS	Again, the "blame" is being placed on regulations and requirements. Won't these be based on some understanding of how human health is affected? Delete this sentence (and other references to "regulations or requirements resulting in a need").		
602	169	1-6	1.3	Rick B., CALFED	Will now preceded 1.2.		
63	170	1-7		jw, DWR	Primary Objectives (also called overall objectives and key program areas in the same paragraph) don't need to be repeated- they were just explained in section 1.2.	C	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
61	171	1-7	Be Equitable, 1st bullet	Finfrock, DWR	Are the secondary objectives enumerated on pages 1-4 to 1-5? If so, there are 19 (not 14). If not, where are the 14 listed? Label them clearly as Secondary Objectives. Okay, I found them in Table 2.1.1-1 and they are quite different from what is on pages 1-4 and 1-5. It's confusing.	C	
62	172	1-7	Reduce Conflicts...	Finfrock, DWR	The introductory sentences from Section 2.1.1.4, page 2-2, are clearer than what is written here.	C	
603	173	1-7	text box left column	Rick B., CALFED	change # in text box to reflect new arrangements. Replace "in the more detailed mission statement appendix" with "in the Program Goals and Objectives Technical Appendix"		
779	174	1-7	Section 1.3.2 "Be Equitable"	Gore, USBOR	The first bullet reference is made to 14 secondary objectives which are not identified until chapter 2. It would be helpful if these objectives were identified in the report before they are referenced.		
778	175	1-7	Section 1.3.1 Bullet 4	Gore, USBOR	To keep a consistent reference it would be helpful to maintain the "Levee System Integrity" terminology versus the "Vulnerability of Delta Functions."		
777	176	1-7	1.3.1, Boxed comment	Lee, USBOR	The "Mission Statement" appendix is not listed in the list of appendices in the "Guide to the Programmatic Environmental Impact Statement/Environmental Impact Report."		
781	177	1-7	1.3.2 "Reduce Conflicts in the System"	Gore, USBOR	Suggest listing conflicts as they relate to the four common programs.		
782	178	1-7	1.3.2, fourth paragraph, first bullet	Lee, USBOR	The four primary objectives along with the fourteen secondary objectives needs to be presented in the main body of the text.		
783	179	1-7	1.3.2, fourth paragraph, second bullet	Lee, USBOR	The "four resource areas," should be clearly defined before setting the goal to balance them.		
64	180	1-7	5	Lehman, DWR	Instead of Fisheries and diversions why not fishery resources. Fish cannot exist without a food web to support them.	T	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
780	181	1-7,8	1.3.2, "Be Equitable" last line of 1-7	Gore, USBOR	The statement is made that "Balance does not necessarily require an equal level of improvement for each resource area." This statement may be confused with the goal of no significant redirected impacts. Also, what is really meant by "reliability weighted improvements." What is the real goal in "balance." It would be helpful to define CALFED's goal in "balance" and clarify what is meant by "reliability weighted improvements."		
784	182	1-8	First full bullet on page	Gore, USBOR	The statement is made..."there is no obligation to provide benefits to those unwilling to contribute towards the solution." This could be misconstrued and inflammatory, to various stakeholders. Should be considered for removal. This statement also conflicts with the following bullet, "Result in net benefits and burden balanced across stakeholder groups."		
1152	183	1-8	"Be Implementable"	FWS	Why is something that "can be implemented relatively quickly" therefore more implementable than something that cannot? Isn't it possible that some solutions may get "broad public acceptance" just because they <i>cannot</i> be implemented quickly? That is, people may come to accept a package that includes something initially unpalatable, as long as they know that particular item can't/won't be implemented quickly, and there's an off-ramp in the process that can be used if continued evaluation says it's no longer necessary? I'd delete this entire bullet.		
1151	184	1-8	"Be Durable"	FWS	The "example" used to explain "Accomodate hydrological and other physical uncertainties" seems out of place: there are no other examples in the entire discussion of solution principals. Is highlighting it meant to suggest that CALFED is committed to increased storage? Delete the entire parenthetical comment.		
1020	185	1-9	box	BK, EPA	consider for use in Executive Summary: Guide p.5, Table 2.1.1.-1, Figure 2.2.2-1, Fig 2.2.4-1, Fig 2.3.2-1, Table 3.1-1, Table 5.3-1, Fig 5.3-1, Resource-specific summary boxes, Table 6.1.1.-2, Table 11.4-1		
507	186	1-9	Left Column, Paragraph 2, Sentence 1	DFG	Implementation will be by local agencies, non-profits such as The Nature Conservancy, and other agency and non-agency entities. The text should be modified here to explain the connection of the Programmatic EIS/EIR to them as well.		
75	187	1-9	Level of Detail...	Finfrock, DWR	This section made the programmatic EIR/EIS much clearer. Move it closer to the beginning, or paraphrase it in the introduction.	C	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
604	188	1-9	section 1.4	Rick B., CALFED	Delete the whole of 1.4.		
785	189	1-9	1.4	Lee, USBOR	The statement is made that the actions proposed by the CALFED program will be implemented by both federal and state agencies. Recommend broadening to include local agencies and private interests.		
16	190	1-9	1.4	DFG	identify all entities that could use this document		
786	191	1-9	1.4.1, third paragraph, third sentence	Lee, USBOR	The opportunity to review and evaluate potential cumulative impacts of the proposed actions should be extended to local agencies and stakeholders.		
18	192	1-9	1.4.1	USFWS	include language that acknowledges systemwide potential impacts will possibly be required at the second tiered level		
1008	1582	Attch p.1	•1st	BK, EPA	Yes, the Guide to the Programmatic EIS/EIR will be helpful		
2	1630	1-9		Robin Reynolds, CDFA	The description of the organization and content of the ADEIR has the statement: "This programmatic EIS/EIR focuses on the whole CALFED Bay-Delta Study area in general and considers cumulative impacts and mitigation strategies on a study area scale." The CDFA suggests that CALFED expand the document to also "Allow the Lead Agency to consider <u>broad policy alternatives</u> and programwide mitigation measures at an early time when the agency has greater flexibility to deal with <u>basic problems</u> or cumulative impacts." (State CEQA Guidelines, Section 15168 (b)(4), emphasis added)		
3	1631	1-9		Robin Reynolds, CDFA	The description of the organization and content of the ADEIR has the statement: "Information presented in a program EIR is very general and does not contain site-specific information." This is not taken from the State CEQA Guidelines section pertaining to Program EIR's (Section 15168), and, in fact, conflicts with the Guidelines for EIR's in general: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." (State CEQA Guidelines, Section 15146). In the case of the CALFED program, very specific actions are contemplated in a number of program areas, especially those related to the so called "Common Programs". (As noted elsewhere in these comments, these were improperly excluded from the ADEIR.) The level of specificity of the EIR must reflect the level of specificity of the whole of the program proposed by CALFED.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	
1153	1644	Pages 1-9 and 10	1.4.1 Level of Detail and Tiering of Information	FWS	<p>This discussion states that "During Phase III of the CALFED Program, second-tier site-specific environmental documents will be prepared for the individual actions or site-specific projects chosen for implementation during the Phase III process." These documents "will concentrate on issues specific to the individual components of the program being implemented or the site chosen for the action."</p> <p>Because the detail contained in the fisheries, vegetation, and wildlife technical appendices analysis is insufficient to provide a meaningful distinction between alternatives or the effects of any one alternative, the potential affects of the project as a whole on fish and wildlife are not evaluated in a meaningful manner in this PEIS.</p> <p>While some components will have very localized affects on fish and wildlife which can be evaluated by a site-specific document, they may also have direct, indirect, cumulative, interrelated, and interdependent affects that are wide-reaching. Additional system-wide detailed analysis will be necessary for those actions during Phase III. The discussions of tiering in the PEIS should be rewritten to clearly state that additional detailed system-wide analysis may be necessary during Phase III to determine the effects of the project as a whole.</p>		

## MISCELLANEOUS

1135	1629	GUIDE	"Guide"	FWS	<p>General Comments: We found that this section was particularly useful for readers who had only limited prior exposure to the PEIS. It could be improved for all readers by a more detailed discussion of the relationship among the main document, the technical appendices, and the Phase II report. As it is now, much of the Guide is devoted to a list of the TAs, which could be provided in the table of contents.</p> <p>Information Presentation: The descriptions of and definitions provided for the alternatives here contribute to the overall feeling that "CALFED is about water supply, delta conveyance, and storage". Recommend including a paragraph or otherwise incorporating language that describes the other parts of the alternatives--common programs, storage, etc. It would be especially useful to discuss, for example, the importance of the Water Use Efficiency Program to CALFED here at the beginning of the document.</p>		
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497	1667	Through-out the AD		DFG	The word "Sacramento" should not be used when referring to "splittail".		
1530	1669	Water Quality Program Sections		SWRCB	The Water Quality Program Plan (WQPP) is discussed in various sections throughout the document. The WQPP identifies significant water quality actions and represents an ambitious undertaking, but implementation of the WQPP requires further scoping to provide adequate detail on the proposed actions. Also, mechanisms to fund and implement the WQPP are not clearly established. Many of these actions are part of existing, insufficiently funded programs in state agencies. CALFED should see this as an opportunity to bring existing efforts together, build upon them, and develop a comprehensive Water Quality Program.		
498	1670	xiv		DFG	Add: "ERPP Ecosystem Restoration Program Plan"		
749	1645	Power Production and Energy Technical Report 2	Bottom paragraph	WAPA	The statement is made that there has been no decision as to how impacts will be distributed between the CVP and SWP; however, throughout this document and other reports, the impact on the CVP have been identified separately. See Tables 2 & 3 for example.		
750	1648	PPETR 5	Figure 3	WAPA	These generally agree with the data presented in the draft. As noted above, we cannot consider these to be insignificant. It is not clear from the report how the data is used to estimate impacts on the Western composite energy rate (see Figure 5, page 7).		
751	1649	PPETR 7	Table 6	WAPA	Why is Table 6 different from Figure 5?		
752	1650	PPETR 13	First paragraph	WAPA	The results of the modeling should be rechecked after the ultimate integration of the PROSIM power module with DWRSIM.		
753	1651	PPETR 15	Right column, third paragraph	WAPA	The value of ancillary services has not been discussed nor is there a discussion of how any value was determined or the levels of ancillary services ascribed to the projects.		
754	1652	PPETR 16	Ancillary Services	WAPA	See above.		



756	1653	PPETR 20	Right column, second paragraph	WAPA	As noted above, in the comments concerning the Draft, the level of Western revenue requirements is not stated and, therefore, it is not possible to reconcile various questions regarding the results contained in these documents and current rate levels. One would assume that revenue requirements would include a certain level of power purchases to meet a set load level. There is no discussion of what load level the purchases are set to accommodate.		
755	1654	PPETR 20	Table 6	WAPA	While there is much discussion of power values in the text, which for the most part is well articulated, the data presented in the table is not supported with specific justification. It is not clear how the author arrived at the values noted. Does this value represent a net present value for some forecast period? If so, what is the period and other assumptions used in the calculations?		
757	1655	PPETR 21	Significance Criteria, Sections 4.1 and 4.4	WAPA	As discussed above, we do not agree with the threshold criteria. the assumption that there is only a significant impact when rates are raised above market is not correct. Also, the document assumes that a Western customer is not adversely affected as long as Western rates are at or below market. Any competitive advantage a Western customer may enjoy as a result of Western power is completely discounted by the approach used to determine significance.		
759	1656	PPETR 26	Left column, middle paragraph	WAPA	The value of 26 mills is not supported. While this may be a reasonable estimate, the logic behind it should be discussed.		
760	1657	PPETR 34	Section 5.3.1.3	WAPA	As noted above, we cannot verify these conclusions without first having access to the data and assumptions upon which they are based.		
761	1658	PPETR 35	Section 5.3.1.5	WAPA	Again, we cannot verify these conclusions without first having access to the data and assumptions upon which they are based. Also, we do not agree with the overall philosophy relative to potential impacts to Western's customers being mitigated through market access.		
762	1659	PPETR 51	Section 5.3.2.3	WAPA	Again, we cannot verify these conclusions without first having access to the data and assumptions upon which they are based.		
763	1660	PPETR 51	Section 5.3.2.5	WAPA	Again, we cannot verify these conclusions without first having access to the data and assumptions upon which they are based. Also, we do not agree with the overall philosophy relative to potential impacts to Western customers being mitigated through market access.		
764	1661	PPETR 62	Section 5.3.3.3	WAPA	Again, we cannot verify these conclusions without first having access to the data and assumptions upon which they are based.		

765	1662	PPETR 62	5.3.3.5	WAPA	Again, we cannot verify these conclusions without first having access to the data and assumptions upon which they are based. Also, we do not agree with the overall philosophy relative to potential impacts to Western customers being mitigated through market access.		
758	1663	PPETR 24-25	Tables 7 & 8	WAPA	When one looks at the data in Table 7, one should be able to calculate the Western revenue requirement; however, such calculations result in a very wide and seemingly inconsistent range of revenue requirements. It is not clear as to how revenues from project use have been treated or the level of power purchases included in the calculation. The price of CVP hydro energy should calculate to approximately \$20 per MWh based on the energy available for sale in the No Action case. The table places the CVP rate at \$24.03 per MWh for the No Action case. While the energy data seems to be consistent with that presented elsewhere, there is insufficient data for one to calculate the energy rate. Of course, this leads directly to the significance issue.		

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